

REMARKS

Claims 1-4, 6, 8-12, 14, 16-20, 22 and 24 are pending. Each of the independent claims 1, 9 and 17 has been amended to incorporate the limitation from claims 7, 15 and 23 respectively. As a result, the latter claims have been canceled, which also renders moot the objections to claims 7 and 23.

Now, in each of the independent claims, the recited pixel replacement operation is performed based on which of the plurality of quadrants in the two-dimensional mask contains screen pixels. The Examiner asserts that this feature is taught by *Lee* (binary median filter 24 and column 9, lines 7-24). Applicants respectfully disagree. The above-noted disclosure in *Lee* concerns the application of the binary median filter to halftone pixels. The median filter smoothes the character edges by setting the center pixel of a 3×3 local map to the majority of the elements in a 3×3 binary map. Thus, this filtering operation is not based on the 7×7 window used by *Lee* to reclassify pixels as halftone or non-halftone. In contrast, the selective low pass filter application in applicants' claimed invention is based on which of the plurality of quadrants in the two-dimensional mask contains screen pixels as determined in the pixel classification check (examining) step/operation/instruction.

Moreover, while *Lee* does not teach or suggest dividing the 3×3 window into overlapping quadrants with the center pixel being common to each, even if such window was artificially divided, it is clear that the filtering is not based on which quadrant(s) contain screen pixels. Rather, *Lee*'s filtering is based simply on a majority determination. To illustrate the difference, consider the following: in the execution of *Lee*'s filtering operation, if, say, only the upper left pixel is a halftone (i.e., only the upper left quadrant contains a halftone pixel), the filtering result would be the same as for the case in which only the lower right pixel is a halftone (i.e., only the lower right quadrant contains a halftone pixel). That is, in *Lee* the filtering result does not depend on which quadrant(s) contain a particular type of pixel. This is contrary to applicants' claimed invention.

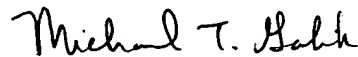
Applicants' also point out that *Lee*'s halftone pixel reclassification operation (see *Lee*, Fig. 8) is also based on a majority determination when the center pixel in the 7×7 window was initially labeled as a halftone pixel. In that

case, if the number of halftone pixels (N_b) is greater than a threshold (T_{n2}), as determined in step 610, the center pixel is labeled as a halftone pixel; otherwise it is labeled as a non-halftone pixel.

Neither of the other references, U.S. patent 4,773,734 to *Inoda* nor U.S. patent 4,194,221 to *Stoffel*, whether combined individually or together with *Lee*, offset these deficiencies in *Lee*.

In view of the foregoing, it is respectfully submitted that this application is patentable over the references of record and therefore in condition for allowance. Should the Examiner believe that any issue remains outstanding, he is encouraged to contact applicants' undersigned attorney in an effort to resolve such issue(s) and advance the case to issue.

Respectfully Submitted,



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